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DATE FILED: 6/20/08

United States Attorney
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 20, 2008

By Facsimile

Honorable Harold Baer, Jr.
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

RECEIVED
JUN 20 2008
U.S. DISTRICT JUDGE
S.D.N.Y.

Re: United States v. Joel Minava,
08 Cr. 33 (HB)

Dear Judge Baer:

A guilty plea is scheduled in the above-referenced case for Monday, June 23, 2008, at 1:00 p.m. However, because of the complexity of the case, which involves international narcotics-trafficking, the Government needs additional time to prepare the plea materials, and the defendant will need time to go over the materials with his counsel. Accordingly, the Government respectfully requests (with the consent of defense counsel) that the Court adjourn Monday's conference to a date during the week of June 30, 2008.

The Government further respectfully requests (with the consent of defense counsel) that the Court exclude the time under the Speedy Trial Act until the next conference date, because the ends of justice served by excluding time under the Speedy Trial Act outweigh the best interest of the public and the defendant in a speedy trial. See 18 U.S.C. § 3161(h)(8). The parties have been involved in extension plea discussions; during this period, the parties will continue to discuss a disposition of this case.

Respectfully submitted,
MICHAEL J. GARCIA
United States Attorney

By: Parvin Moyn
Assistant United States Attorney
Telephone: (212) 637-2510

cc:

Ed Palermo, Esq.

GO ORDERED:
(by facsimile)

Harold Baer, Jr., U.S.D.J.

Date: 6/20/08

Endorsement:

I'll exclude the time through June 23 but direct that the plea occur before a U.S. Magistrate Judge - fix the date with him or her.